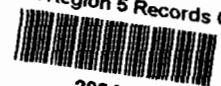


EPA Region 5 Records Ctr.



298147

943955

B R O C H U R E

Richard Krohn and Parkway Bank and Trust Company
as Trustee under Trust No. 4730

EPA File No. 6714

Contents:

- Summary of Brochure
- Brochure
- Exhibits
- Draft Complaint
- Draft Request to Admit
- Genuiness of Documents

SUMMARY OF BROCHURE

Richard Krohn owns a landfill of approximately 100 acres in Glenview, Illinois that is permitted to accept non-putrescible, non-flammable, cold waste. He has failed to comply with his permit by not installing monitoring wells, not promptly sealing leachate seeps and not developing and closing the site in accordance with the permit. He also has failed to spread incoming waste as received in accordance with Rule 303 of the Solid Waste Regulations.

DESCRIPTION OF SITE

The Krohn (Lutter Brick) landfill is an approximately 100 acre site permitted to take solid, non-putrescible, non-flammable fill, located at Chestnut Avenue and Johns Drive in Glenview, Illinois. Permits issued for the site are included as Exhibits 1, 2, 8, 16, 19 and 20. A history of the site is included in Exhibits 1A, 1B, 15 and 20 (the third page of the Court Order of Exhibit 1A is missing).

Agency inspections at the site date to 1972. Included in this brochure are records of inspections from 1981 to the current date, the time period in which Richard Krohn has owned and operated the site. The remainder of the inspection reports and other material in the file is available for review at any time.

VIOLATIONS

Current violations at the site are as follows:

Respondent has failed to install monitoring wells as required by its permit in violation of Rules 301 and 302 of the Solid Waste Regulations and therefore of Section 21(d) of the Act. (Exhibits 27, 33, 39, 42, 43, 44, 45, 47, 48 and 49)

Respondent has failed to control leachate as required by a special condition of its permit, on or about the following dates: Aug. 11, 1981, Oct. 21, 1981, Oct. 27, 1982, Dec. 22, 1982, Jan. 18, 1983, Feb. 1, 1983, Feb. 17, 1983, Mar. 3, 1983 and Mar. 25, 1983, in violation of Rules 301 and 302 of the Solid Waste Regulations and therefore of Section 21(d) of the Act. (Exhibits 9, 10, 13, 24, 25, 26, 27, 30, 31, 44, 47, 48 and 49)

Respondent has failed to spread and compact the waste it receives as required by Rules 303(b) of the Solid Waste Regulations, on or about the following dates: Oct. 25, 1982, Jan. 18, 1983, Feb. 2, 1983, Mar. 3, 1983, and Mar. 25, 1983, in violation of that rule and therefore of Section 21(d) of the Act. (Exhibits 25, 26, 30, 31, 33, 39, 42, 44, 47, 48 and 49)

Respondent has failed to develop the site as required by its permit, in violation of Rules 301 and 302 of the Solid Waste Regulations and therefore of Section 21(d) of the Act.

With respect to monitoring wells, the present permit requires five monitoring wells. On April 25, 1983, Respondent submitted to the Agency an application for a supplemental permit to reduce the number of wells to three. This was denied by the Agency on July 20, 1983. (Exhibits 22, 51 and 58) The reasons for the Agency's belief that five wells are required are outlined in Exhibits 15 and 58.

With respect to failure to spread and compact, Respondent presently allows trucks to unload waste in piles at various locations on the site. The loads consist of broken concrete, asphalt, brickbat, and other solid fill. Although Respondent generally has a piece of equipment on site capable of spreading these piles, he retains an operator only irregularly to perform this task. Joseph Pierro, the site engineer, has said that Krohn has an arrangement with a local contractor whereby Krohn receives fill in return for free labor by a heavy equipment operator; however, because the contractor has brought in little fill, Krohn has not had a operator to operate his equipment as required.

Under normal circumstances, failure to spread and compact the waste received at the Krohn Landfill would not cause an environmental problem, because the waste, being non-putrescible, will not attract vectors; however, in this case, the landfill is surrounded on two sides by single family homes and condominiums, and the failure to spread causes an aesthetic eyesore. This has led to intense local opposition to the landfill. The Agency has also received complaints about excessive dust.

With respect with failure to develop the site in accordance with its permit, the supplemental permit issued by the Agency on September 14, 1982 requires development and closure of the site in four phases. (See Exhibit 19 which is incorporated into the Agency supplemental permit by reference) In connection with the above described practice of unloading, Respondent allows the loads to be deposited throughout the entire site, rather than following the permit and depositing all loads in Phase 1. Agency Inspection and Observation Reports do not reflect this violation. However, Glenn Sternard, the Agency field inspector for this site, can testify that Respondent has not developed the site in accordance with the plan.

EFFORTS TO BRING RESPONDENT INTO COMPLIANCE

In response to correspondence of January 13, 1983, a Pre-Enforcement Conference was held with representatives of Richard Krohn on January 22, 1983. (See Exhibits 20 and 34) A follow up meeting and telephone conference were held on March 15th and 25th respectively. Respondents position with respect to spreading, compacting and providing cover was that the cost of providing sufficient cover at the present time was too high. With respect to installation of monitoring wells, Respondent

submitted an application for a supplemental permit to reduce the number of wells from five to three. This application was denied by the Agency and the wells have not been installed.

ENVIRONMENTAL HARM

The environmental harm resulting from Respondent's violations is the following:

Monitoring wells are necessary to determine whether the site is causing any groundwater contamination (as the result of general refuse deposited at the site in the 1950's and early 1960's).

Leachate from the site has flowed to the West Branch of the North Fork of the Chicago River.

Failure to spread and compact and develop the site in accordance with the permit has resulted in an eyesore for nearby residents.

COST OF COMPLIANCE

The primary costs of compliance in this case are the cost of installing monitoring wells and the cost of labor and equipment for spreading. The cost of monitoring wells will be in excess of \$5,000.

With respect to labor and equipment, Krohn started receiving larger amounts of fill approximately April, 1982. Based upon 1) an estimate that fill was received on an average of 2 days per week of all but three winter months, 2) an estimate that an equipment operator would need three hours to spread the waste received on those days, and 3) an estimate of \$100 per equipment operator day for this three hour period, Respondent has saved approximately \$10,400.

SETTLEMENT/LITIGATION DEMANDS

The Agency is seeking the following relief:

1. Installation of all required monitoring wells.
2. Prompt sealing of all leachate seeps as they occur.
3. Spreading and compacting of all waste presently on the site in accordance with Rule 303(b) of the Solid Waste Regulations and the permit plan for closure.
4. Closure of the site in accordance with the permit by a date certain.
5. A monetary penalty of \$7,500 if this case is settled by a stipulation or a penalty of \$12,000 if the case is litigated.

The penalty recommendation is based upon the cost savings to Respondent by non-compliance and his continued refusal to achieve compliance. A factor in mitigation of the penalty is that the waste is non-putrescible and therefore will cause no water pollution.

DEFENSES TO BE RAISED

Respondent has not raised any substantial defenses to date.

WITNESSES

Kenneth Bechely, Manager, Field Operation Staff for Division of Land Pollution, Northern Region, Maywood, Illinois.

Glenn Sternard, Environmental Protection Specialist, Maywood, Illinois.

PRIORITY

This case has normal priority.

LIST OF EXHIBITS

- 1A. Two pages of three page Court Order in People v. Metropolitan Disposal Company, et al., No. 63C7237 in the Circuit Court of Cook County.
- 1B. Correspondence dated January 5, 1973 from Robert L. Anderson to IEPA.
- 1. IEPA Development Permit No. 1973-68-DE issued on December 18, 1973, to Land and Lakes Company.
- 2. IEPA Operation Permit No. 1973-68-OP Issued on February 26, 1974, to Land and Lakes Company.
- 3. IEPA Inspection Report dated January 28, 1981.
- 4. Correspondence dated January 30, 1981 from IEPA to Richard Krohn and Douglas Kutz.
- 5. Correspondence dated February 2, 1981 from DCK Construction Management Corp. to IEPA.
- 6. IEPA Inspection Report dated March 24, 1981.
- 7. Correspondence dated March 30, 1981 from IEPA to Douglas Kutz.
- 8. Application for Permit Transfer to IEPA granted on June 30, 1981 together with revised permits issued on that date reflecting said transfers.
- 9. IEPA Inspection Report dated August 11, 1981.
- 10. Correspondence dated September 17, 1981 from IEPA to Richard Krohn.
- 11. Correspondence dated September 22, 1981 from Krohn Development Corp. to IEPA.
- 12. IEPA Observation Report dated September 24, 1981.
- 13. IEPA Inspection Report dated October 20, 1981.
- 14. IEPA Observation Report dated October 22, 1981.
- 15. IEPA Memorandum dated December 28, 1981.
- 16. Document entitled "Report on Closure and Monitoring for the Lutter Brick Landfill" dated January 27, 1982.
- 17. IEPA Chemical Analysis Forms for Sample No. C004311 collected April 1, 1982.
- 18. Correspondence dated April 5, 1982 from IEPA to William J. Stanley & Associates, Inc.

LIST OF EXHIBITS
PAGE 2.

19. Document entitled "Supplemental Permit No. 1 Closing Procedure Lutter Landfill Site" dated April 15, 1982 together with copy of Plant Survey showing Proposed Landfill Closure Grading and Drainage Plan.
20. IEPA Supplemental Permit No. 1982-83 issued on September 14, 1982 to Richard Krohn.
21. Correspondence dated August 23, 1982 from IEPA to Richard Krohn.
22. IEPA Supplemental Permit No. 1982-83 issued on September 14, 1982 to Richard Krohn, together with cover letter dated September 13, 1982 from IEPA to Richard Krohn.
23. IEPA Observation Report dated October 26, 1982.
24. IEPA Chemical Analysis Forms for Sample Nos. C001994 and C001995 collected on October 27, 1982.
25. IEPA Inspection Report dated October 27, 1982 together with nine (9) photographs.
26. Correspondence dated November 30, 1982 from IEPA to Richard Krohn.
27. IEPA Observation Report dated December 22, 1982.
28. Correspondence dated January 7, 1982(sic) from Valley Lo Home Owner's Association to IEPA.
29. Correspondence dated January 10, 1983 from South Valley Lo Condominium Association to IEPA.
30. Correspondence dated January 11, 1983 from William J. Stanley and Associates, Inc. to IEPA.
31. Correspondence dated January 13, 1983 from IEPA to Richard Krohn.
32. Newspaper article of January 20, 1983 entitled "Dump Operating".
33. IEPA Inspection Report dated January 18, 1983 together with four (4) photographs and cover letter dated January 19, 1983 from IEPA to Richard Krohn.
34. Correspondence dated January 25, 1983 from IEPA to South Valley Lo Condominium Association.

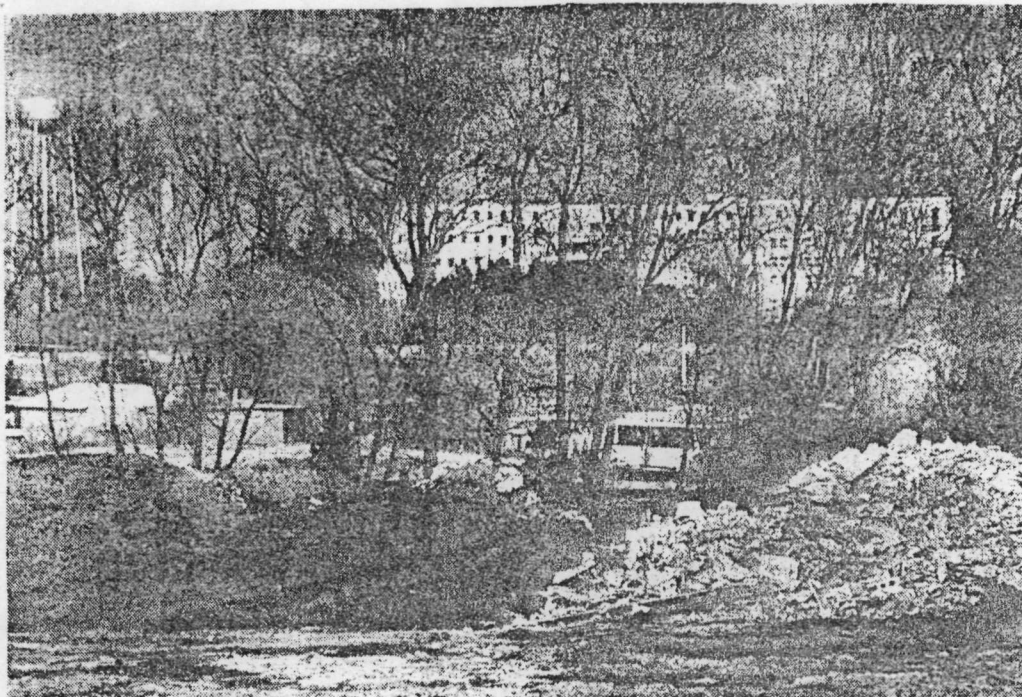
LIST OF EXHIBITS
PAGE 3.

35. Correspondence dated January 28, 1983 from IEPA to South Valley Lo Condominium Association.
36. Correspondence dated January 28, 1983 from IEPA to Valley Lo Home Owner's Association.
37. IEPA Observation Report dated February 1, 1983.
38. Undated Newspaper Article captioned "Glenview Residents want dump sealed off".
39. Correspondence dated February 3, 1983 from IEPA to Valley Lo Home Owner's Association.
40. Correspondence dated February 3, 1983 from Krohn Development Corporation to IEPA.
41. IEPA Observation Report dated February 4, 1983.
42. IEPA Inspection Report dated February 17, 1983 together with cover letters dated February 25, 1983 from IEPA to Richard Krohn and Village of Glenview.
43. Correspondence dated February 28, 1983 from Krohn Development Corporation to IEPA.
44. IEPA Inspection Report dated March 3, 1983 together with cover letter dated March 8, 1983 from IEPA to Richard Krohn.
45. Correspondence dated March 3, 1983 from IEPA to Richard Krohn.
46. Correspondence dated March 14, 1983 from Krohn Development Corporation to IEPA.
47. Correspondence dated March 25, 1983 from IEPA to Krohn Development Corporation.
48. IEPA Inspection Report dated March 25, 1983.
49. Correspondence dated March 31, 1983 from Krohn Development Corporation to IEPA.
50. Correspondence dated April 4, 1983 from Krohn Development Corporation to IEPA.

LIST OF EXHIBITS

PAGE 4.

51. Application for permit modification dated April 21, 1983 from Cowhey Associates Ltd. to IEPA.
52. Correspondence dated April 21, 1983 from South Valley Lo Condominium Association to IEPA.
53. Correspondence dated April 21, 1983 from South Valley Lo Condominium Association to Army Corps. of Engineers.
54. Correspondence dated May 9, 1983 from Village of Glenview to IEPA.
55. Correspondence dated May 20, 1983 from IEPA to South Valley Condominium Association.
56. Correspondence dated May 23, 1983 from IEPA to Village of Glenview.
57. Correspondence dated May 25, 1983 from IEPA to Richard Krohn.
58. Permit denial letter dated July 20, 1983 from IEPA to Krohn Development Corporation.



The owner of the Lutter Dump has not complied with an order to cover and close out the landfill. The two piles of debris and clean fill have not been spread over the dump as was ordered by the Illinois Environmental Protection Agency.

Dump operating¹⁰ Landfill owner violating IEPA order, officials say

By TODD SLOANE

The owner of the Lutter Dump has abandoned plan to close the landfill, thus violating an Illinois Environmental Protection Agency (IEPA) order, village and state officials say.

The dump, on Chestnut Av. between Johns and Tanglewood Drs., still is accepting dirt and construction debris, according to IEPA officials who have inspected the dump and village officials who have been monitoring the landfill.

While the dump has not been shown to contain any potentially hazardous chemicals or materials, monitoring wells that could reveal them have not been dug.

Last April, the village and dump owner Richard Krohn came to an agreement on closing the dump, and in August, the IEPA issued a closeout order.

UNDER THAT FOUR-PHASE plan, Krohn was to regrade the 60-acre dump to include a large hill on the western portion, and a gradual slope towards the North Branch of the Chicago River, where storm water would drain off. In addition, several drainage swales also were to be constructed to hold additional runoff.

Six groundwater monitoring wells and three methane gas monitoring wells were to be drilled to check for possible hazardous materials.

While Krohn did bring in some equipment to start the closeout plan, he did not complete it, according to Steve Pudloski, village director of development and public services.

On Sept. 27 an IEPA inspection showed that liquid from the site was running into the river, demolition debris had been dumped in piles rather than being spread out, and bricks, railroad ties and other materials had also been dumped on the site, all in violation of IEPA orders.

FOLLOWING THE INSPECTION, a letter was written to Krohn giving him 10 days to start complying with the closeout plan. The dump, however, has been accepting dump trucks with debris since the deadline passed, and no grading of the site has taken place, according to neighbors.

Pudloski said he has "been after the IEPA to do something, like enforce its order." However, so far he said he has gotten no response.

"They (the IEPA) have got many other sites where there is evidence of hazardous material. It may be that the Lutter Dump is just low on its priority list," he said.

A report that Krohn was scheduled to meet with state officials today was not confirmed by the IEPA Wednesday. Krohn was unavailable for comment this week.

Bernice Reder, 2104 Vally Lo Ln., heads a 38-household organization fighting to close the nearby dump. She said Wednesday, "We are concerned that nothing has so far been done about the closing."



One of five "temporary silt basins" for containing seepage is shown at the Lutter Dump off Chestnut Av. in north Glenview. The hay around the storm sewer cover is designed to prevent silt from entering the sewer. (Staff photos by Jim Robinson)

"WE HAVE BEEN TRYING for a year and a half to get this dump closed, and I know the village wants (the closing) done right, but we are the ones who have to live with what is going on."

Reder said that the major problems with the landfill are dust blowing from the site in warmer months and the erosion of the material into the Chicago River.

"The potential for flooding increases every time it rains, because the material is raising the level of the river," she said.

Also, she said the potential for underground pollution by the seeping of the material into the groundwater and the earth beneath the landfill could have an impact upon Lake Valley Lo, which is a man-made spring-fed lake in the center of the Valley Lo development.

Pudloski said the reason Krohn has not followed through with the closeout plan may be simple economics. He estimated that the cost of buying the soil and paying for the grading and seeding of the landfill could be as high as \$600,000.

He said payment Krohn received for permitting the dumping would help him pay for the dump closing.

LPC
1/20/83
Cook Co.

Illinois Press Association
(Press Services Inc.)
1035 Outer Park Drive
Springfield, IL 62704
217/793-0070

GLENVIEW
Announcements
7,421 Th

JAN 20 1983

27

(Location) (Responsible Party)
Samples Taken: Yes () No (X) Time: From 09:45 AM Weather Cloudy 40°
Ground Water() Surface() Other() To 10:00 AM
Photos Taken: Yes () No (X) Interviewed _____ Inspector L A C
(27) (29)

Previous Inspection 3-25-83 Previous Correspondence 3-25-83 Site Open: Yes() No(X)

OPERATIONAL STATUS:

Operating (X)
Temporarily Closed ()
Closed Not Covered ()
Closed and Covered ()

TYPE OF OPERATION:

Landfill (X)
Random Dump ()
Other ()
Quantity Received Daily(1-6) 1
(30)

Storage ()
Salvage ()
A.C.D. ()

AUTHORIZATION:

E.P.A. Permit (X)
Variance ()
21(e) ()
Board Order ()
Illegal (5) ()

IMPROVED

Apparent Non-Compliance (5) ()

(SAME)

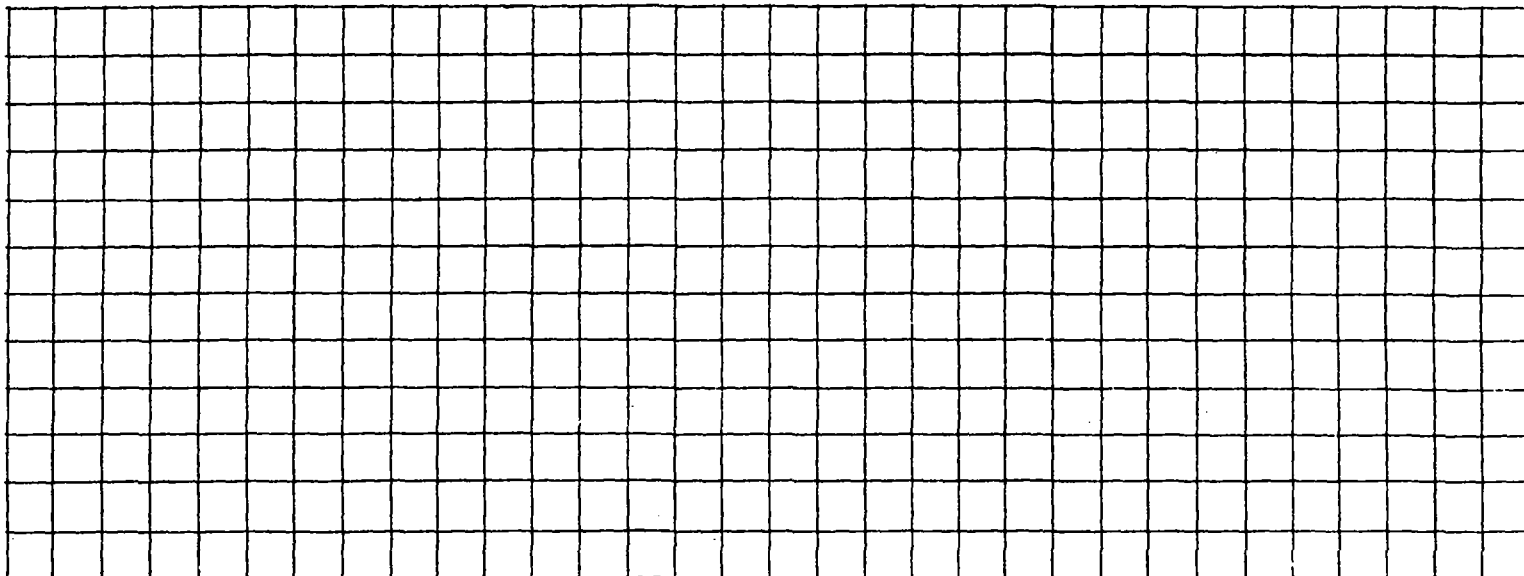
DETERIORATED

I S or D 5
(62)

GENERAL REMARKS: The site was closed and a chain blocked the entrance to the site. A truck with concrete and dirt was at the gate when we arrived. The DRIVER told us he had been directed to dump at the Landfill. However, since the site was locked he took the load to Lake Landfill. The KADON site need some spreading and compacting.

INTERVIEW:

DIAGRAM:





Illinois Environmental Protection Agency • 2200 Churchill Road, Springfield, IL 62706

217/782-8761

MAY 9, 1984

RICHARD KROHN
PO BOX 30041
CHICAGO, IL 60630

REFER TO: COOK COUNTY
SITE 05110201
GLERVIER/KROHN

GENTLEMEN:

THIS LETTER IS WRITTEN IN REGARD TO YOUR WATER MONITORING PROGRAM AS OUTLINED BY THE FOLLOWING:

OPERATING PERMIT NUMBER 1975-68-06
SUPPLEMENTAL PERMIT NUMBER 1982-83

ISSUED 06/30/81
ISSUED 09/14/82

THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY HAS NOTED THAT YOUR WATER MONITORING PROGRAM HAS NOT BEEN CONDUCTED IN ACCORDANCE WITH THE ABOVE PERMIT CONDITIONS AND AGENCY REQUIREMENTS. THE FOLLOWING DEFICIENCIES WERE NOTED:

MONITOR REPORTING POINT	QUARTER	DEFICIENCIES NOTED	PARAMETERS NOT REPORTED
S102	04/16/84	A QUARTERLY ANALYSIS REPORT WAS NOT FILED	
S103	04/16/84	A QUARTERLY ANALYSIS REPORT WAS NOT FILED	
S104	04/16/84	A QUARTERLY ANALYSIS REPORT WAS NOT FILED	
S105	04/16/84	A QUARTERLY ANALYSIS REPORT WAS NOT FILED	
S106	04/16/84	A QUARTERLY ANALYSIS REPORT WAS NOT FILED	
S107	04/16/84	A QUARTERLY ANALYSIS REPORT WAS NOT FILED	
S108	04/16/84	A QUARTERLY ANALYSIS REPORT WAS NOT FILED	

WE ASK THAT YOU CORRECT THE ABOVE DEFICIENCIES IMMEDIATELY. ALSO, YOU ARE REQUESTED TO IMMEDIATELY WATER AND FERTILIZER REPORTS ARE DUE IN THIS OFFICE BY THE 15TH OF JANUARY, APRIL, JULY AND OCTOBER. YOUR COMPLIANCE WITH THE ABOVE DATES WILL BE APPRECIATED.

PLEASE DIRECT ALL RESPONSES AND QUESTIONS TO DEANE BULLOCK OR PAT TROMBAY OF MY STAFF.

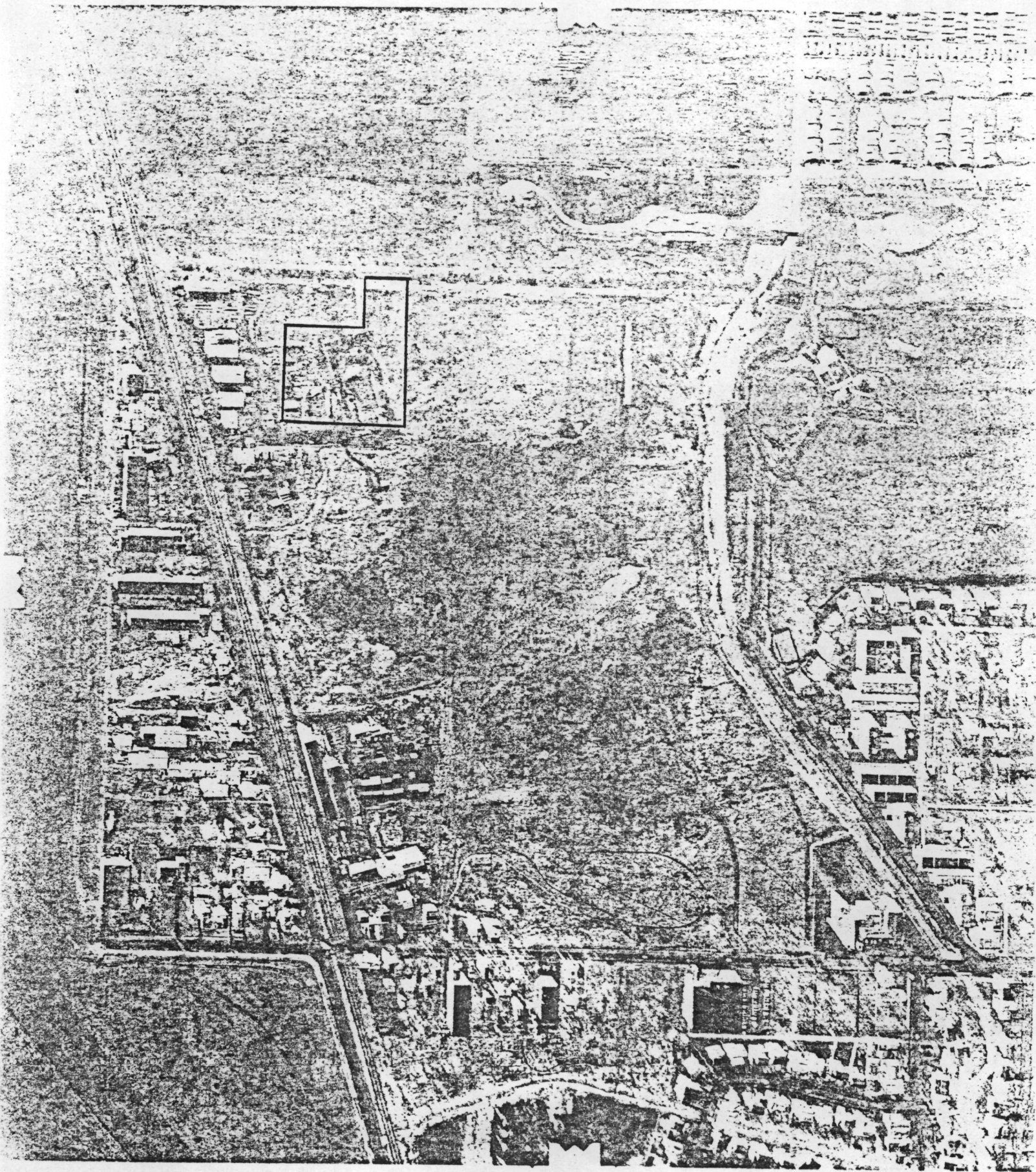
VERY TRULY YOURS,

Mark Cheney

PAUL R. HARTY, ASST. DIR.
COMPLIANCE DIVISION
COMPLIANCE MONITORING SECTION
DIVISION OF LAND POLLUTION CONTROL

CC: DIVISION FOR FILE
CLOSURE SERIES

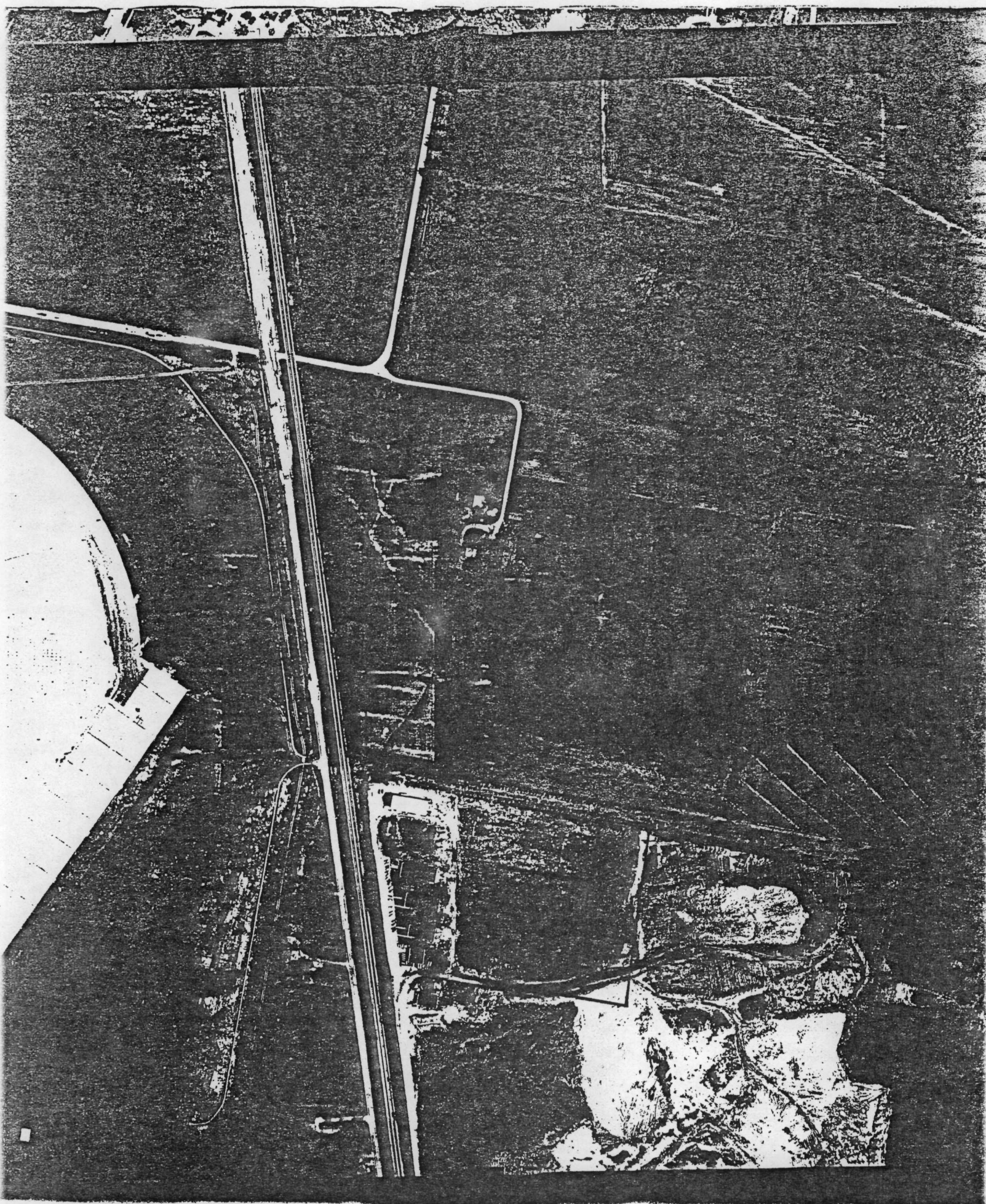
4 1"=500'± (1971)



4
N

1" = 390 ±

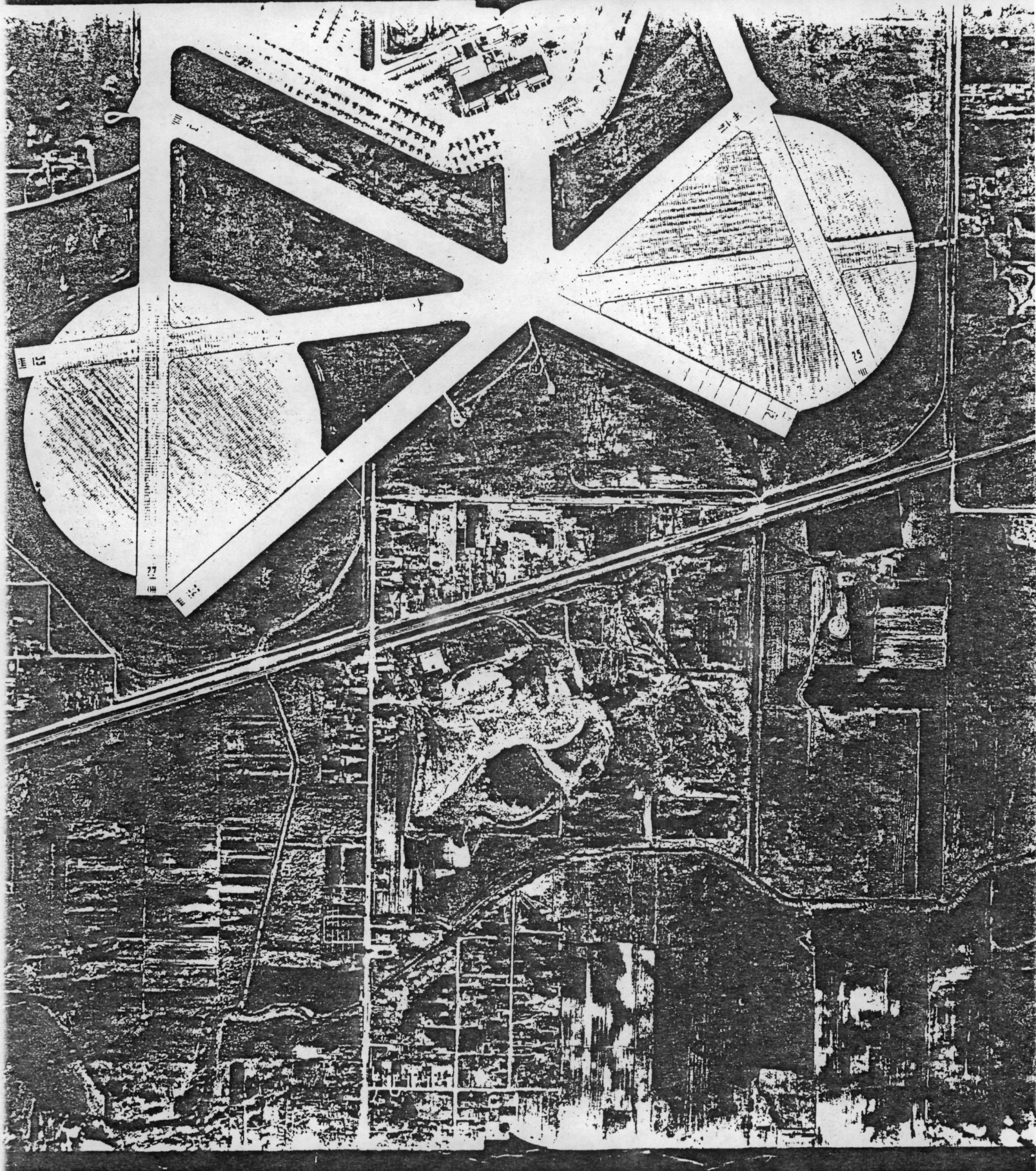
(EARLY 50's)



N

1" = 860'

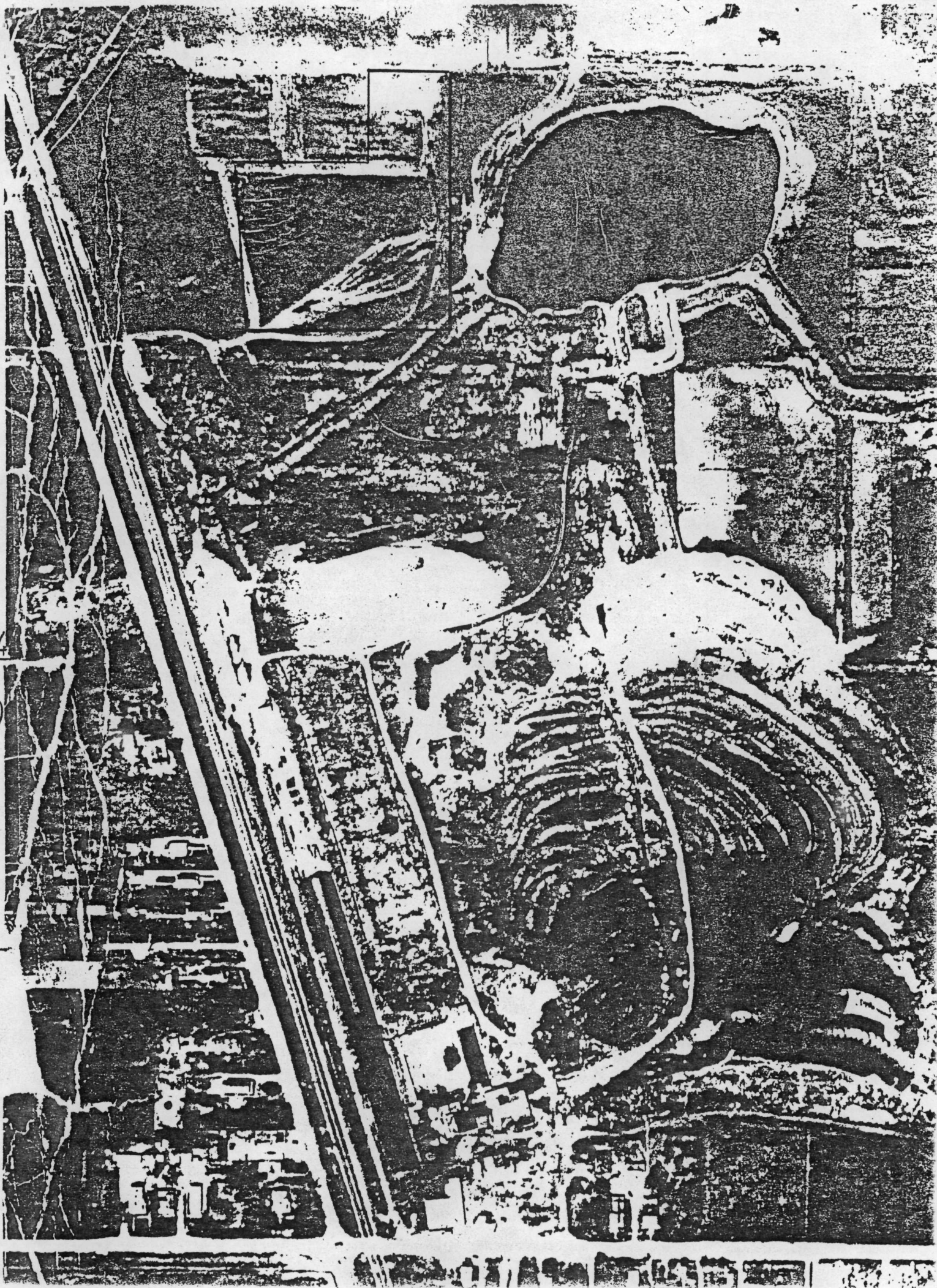
3/29/49



4

275'

740)





ecology and environment, inc.

223 WEST JACKSON BLVD., CHICAGO, ILLINOIS 60606, TEL. 312-663-9415

International Specialists in the Environmental Sciences

DATE: December 30, 1980

TO: File

FROM: C.F. Bieze, Jr. CFB

SUBJECT: Illinois/Eckhardt Report Sites; TDD# F5-8011-4
Glenview/Lutter Brickyard

A review of available file information on the above site has been completed pursuant to TDD# F5-8011-4. Results of the file review indicate that a low priority of importance ranking be assessed to the site. This ranking is based upon the following factors:

1. The site is being monitored by Illinois EPA and/or the local health department.
2. No continuing health or illness problems have been attributed to the site.

The recommendation that no further action be taken by USEPA is made with the understanding that the state and local agencies now involved will continue to monitor site activities.

CFB/ct



POTENTIAL HAZARDOUS WASTE SITE
FINAL STRATEGY DETERMINATION

REGION SITE NUMBER
IV

File this form in the regional Hazardous Waste Log File and submit a copy to: U.S. Environmental Protection Agency; Site Tracking System; Hazardous Waste Enforcement Task Force (EN-335); 401 M St., SW; Washington, DC 20460.

I. SITE IDENTIFICATION

A. SITE NAME
Lutter Dump

D. STREET
East of Glenview Road Air Station

C. CITY
Glenview

D. STATE
IL

E. ZIP CODE

II. FINAL DETERMINATION

Indicate the recommended action(s) and agency(ies) that should be involved by marking 'X' in the appropriate boxes.

RECOMMENDATION	MARK 'X'	ACTION AGENCY			
		EPA	STATE	LOCAL	PRIVATE
A. NO ACTION NEEDED	X	X			
B. REMEDIAL ACTION NEEDED, BUT NO RESOURCES AVAILABLE (If yes, complete Section III.)					
C. REMEDIAL ACTION (If yes, complete Section IV.)					
D. ENFORCEMENT ACTION (If yes, specify in Part E whether the case will be primarily managed by the EPA or the State and what type of enforcement action is anticipated.)					

E. RATIONALE FOR FINAL STRATEGY DETERMINATION

EPA site inspection & lab results indicate site not 311 actionable

F. IF A CASE DEVELOPMENT PLAN HAS BEEN PREPARED, SPECIFY THE DATE PREPARED (mo., day, & yr.).

G. IF AN ENFORCEMENT CASE HAS BEEN FILED, SPECIFY THE DATE FILED (mo., day, & yr.).

H. PREPARER INFORMATION

1. NAME
Paul Demich

2. TELEPHONE NUMBER
886-6710

3. DATE (mo., day, & yr.)
10-22-80

III. REMEDIAL ACTIONS TO BE TAKEN WHEN RESOURCES BECOME AVAILABLE

List all remedial actions, such as excavation, removal, etc. to be taken as soon as resources become available. See instructions for a list of Key Words for each of the actions to be used in the spaces below. Provide an estimate of the approximate cost of the remedy.

A. REMEDIAL ACTION	B. ESTIMATED COST	C. REMARKS
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
D. TOTAL ESTIMATED COST	\$	



POTENTIAL HAZARDOUS WASTE SITE
IDENTIFICATION AND PRELIMINARY ASSESSMENT

REGION IV	SITE NUMBER (to be assigned by HQ) IL-000 060 09
---------------------	--

NOTE: This form is completed for each potential hazardous waste site to help set priorities for site inspection. The information submitted on this form is based on available records and may be updated on subsequent forms as a result of additional inquiries and on-site inspections.

GENERAL INSTRUCTIONS: Complete Sections I and III through X as completely as possible before Section II (Preliminary Assessment). File this form in the Regional Hazardous Waste Log File and submit a copy to: U.S. Environmental Protection Agency; Site Tracking System; Hazardous Waste Enforcement Task Force (EN-335); 401 M St., SW; Washington, DC 20460.

I. SITE IDENTIFICATION

A. SITE NAME LUMBER DUMP		B. STREET (or other identifier) EAST OF GLENVIEW NAVAL AIR STATION	
C. CITY GLENVIEW	D. STATE IL	E. ZIP CODE	F. COUNTY NAME
G. OWNER/OPERATOR (If known) 1. NAME		2. TELEPHONE NUMBER	
H. TYPE OF OWNERSHIP <input type="checkbox"/> 1. FEDERAL <input type="checkbox"/> 2. STATE <input type="checkbox"/> 3. COUNTY <input type="checkbox"/> 4. MUNICIPAL <input checked="" type="checkbox"/> 5. PRIVATE <input type="checkbox"/> 6. UNKNOWN			
I. SITE DESCRIPTION SANITARY LANDFILL			
J. HOW IDENTIFIED (i.e., citizen's complaints, OSHA citations, etc.) CITIZEN COMPLAINT		K. DATE IDENTIFIED (mo., day, & yr.) 6-10-80	
L. PRINCIPAL STATE CONTACT 1. NAME		2. TELEPHONE NUMBER	

II. PRELIMINARY ASSESSMENT (complete this section last)

A. APPARENT SERIOUSNESS OF PROBLEM <input type="checkbox"/> 1. HIGH <input type="checkbox"/> 2. MEDIUM <input checked="" type="checkbox"/> 3. LOW <input type="checkbox"/> 4. NONE <input type="checkbox"/> 5. UNKNOWN	
B. RECOMMENDATION <input type="checkbox"/> 1. NO ACTION NEEDED (no hazard) <input type="checkbox"/> 2. IMMEDIATE SITE INSPECTION NEEDED a. TENTATIVELY SCHEDULED FOR: b. WILL BE PERFORMED BY: <input checked="" type="checkbox"/> 4. SITE INSPECTION NEEDED (low priority)	
C. PREPARER INFORMATION 1. NAME PAUL DIMOCK 2. TELEPHONE NUMBER 886-6710 3. DATE (mo., day, & yr.) 6-13-80	

III. SITE INFORMATION

A. SITE STATUS <input checked="" type="checkbox"/> 1. ACTIVE (Those industrial or municipal sites which are being used for waste treatment, storage, or disposal on a continuing basis, even if infrequently.) <input type="checkbox"/> 2. INACTIVE (Those sites which no longer receive wastes.) <input type="checkbox"/> 3. OTHER (specify):	
B. IS GENERATOR ON SITE? <input checked="" type="checkbox"/> 1. NO <input type="checkbox"/> 2. YES (specify generator's four-digit SIC Code):	
C. AREA OF SITE (in acres) 100 APPROX.	D. IF APPARENT SERIOUSNESS OF SITE IS HIGH, SPECIFY COORDINATES 1. LATITUDE (deg., min., sec.) 2. LONGITUDE (deg., min., sec.)
E. ARE THERE BUILDINGS ON THE SITE? <input type="checkbox"/> 1. NO <input type="checkbox"/> 2. YES (specify):	

IV. CHARACTERIZATION OF SITE ACTIVITY

Indicate the major site activity(ies) and details relating to each activity by marking 'X' in the appropriate boxes.

<input checked="" type="checkbox"/> A. TRANSPORTER	<input checked="" type="checkbox"/> B. STORER	<input checked="" type="checkbox"/> C. TREATER	<input checked="" type="checkbox"/> D. DISPOSER
1. RAIL	1. PILE	1. FILTRATION	1. LANDFILL
2. SHIP	2. SURFACE IMPOUNDMENT	2. INCINERATION	2. LANDFARM
3. BARGE	3. DRUMS	3. VOLUME REDUCTION	3. OPEN DUMP
4. TRUCK	4. TANK, ABOVE GROUND	4. RECYCLING/RECOVERY	4. SURFACE IMPOUNDMENT
5. PIPELINE	5. TANK, BELOW GROUND	5. CHEM./PHYS. TREATMENT	5. MIDNIGHT DUMPING
6. OTHER (specify):	6. OTHER (specify):	6. BIOLOGICAL TREATMENT	6. INCINERATION
		7. WASTE OIL REPROCESSING	7. UNDERGROUND INJECTION
		8. SOLVENT RECOVERY	8. OTHER (specify):
		9. OTHER (specify):	

E. SPECIFY DETAILS OF SITE ACTIVITIES AS NEEDED

V. WASTE RELATED INFORMATION

A. WASTE TYPE

☒ 1. UNKNOWN ☐ 2. LIQUID ☐ 3. SOLID ☐ 4. SLUDGE ☐ 5. GAS

B. WASTE CHARACTERISTICS

☒ 1. UNKNOWN ☐ 2. CORROSIVE ☐ 3. IGNITABLE ☐ 4. RADIOACTIVE ☐ 5. HIGHLY VOLATILE
☐ 6. TOXIC ☐ 7. REACTIVE ☐ 8. INERT ☐ 9. FLAMMABLE
☐ 10. OTHER (specify):

C. WASTE CATEGORIES

1. Are records of wastes available? Specify items such as manifests, inventories, etc. below.

2. Estimate the amount (specify unit of measure) of waste by category; mark 'X' to indicate which wastes are present.

a. SLUDGE	b. OIL	c. SOLVENTS	d. CHEMICALS	e. SOLIDS	f. OTHER
AMOUNT	AMOUNT	AMOUNT	AMOUNT	AMOUNT	AMOUNT
UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE
<input checked="" type="checkbox"/> (1) PAINT, PIGMENTS	<input checked="" type="checkbox"/> (1) OILY WASTES	<input checked="" type="checkbox"/> (1) HALOGENATED SOLVENTS	<input checked="" type="checkbox"/> (1) ACIDS	<input checked="" type="checkbox"/> (1) FLYASH	<input checked="" type="checkbox"/> (1) LABORATORY PHARMACEUT.
(2) METALS SLUDGES	(2) OTHER (specify):	(2) NON-HALOGENATED SOLVENTS	(2) PICKLING LIQUORS	(2) ASBESTOS	(2) HOSPITAL
(3) POTW		(3) OTHER (specify):	(3) CAUSTICS	(3) MILLING/ MINE TAILINGS	(3) RADIOACTIVE
(4) ALUMINUM SLUDGE			(4) PESTICIDES	(4) FERROUS SMLTG. WASTES	(4) MUNICIPAL
(5) OTHER (specify):			(5) DYES/INKS	(5) NON-FERROUS SMLTG. WASTES	(5) OTHER (specify):
			(6) CYANIDE	(6) OTHER (specify):	
			(7) PHENOLS		
			(8) HALOGENS		
			(9) PCB		
			(10) METALS		
			(11) OTHER (specify):		

V. WASTE RELATED INFORMATION (continued)

3. LIST SUBSTANCES OF GREATEST CONCERN WHICH MAY BE ON THE SITE (place in descending order of hazard).

4. ADDITIONAL COMMENTS OR NARRATIVE DESCRIPTION OF SITUATION KNOWN OR REPORTED TO EXIST AT THE SITE.

VI. HAZARD DESCRIPTION

A. TYPE OF HAZARD	B. POTENTIAL HAZARD (mark 'X')	C. ALLEGED INCIDENT (mark 'X')	D. DATE OF INCIDENT (mo., day, yr.)	E. REMARKS
1. NO HAZARD				
2. HUMAN HEALTH				
3. NON-WORKER INJURY/EXPOSURE				
4. WORKER INJURY				
5. CONTAMINATION OF WATER SUPPLY				
6. CONTAMINATION OF FOOD CHAIN				
7. CONTAMINATION OF GROUND WATER	X			
8. CONTAMINATION OF SURFACE WATER	X			
9. DAMAGE TO FLORA/FAUNA				
10. FISH KILL				
11. CONTAMINATION OF AIR				
12. NOTICEABLE ODORS				
13. CONTAMINATION OF SOIL				
14. PROPERTY DAMAGE				
15. FIRE OR EXPLOSION				
16. SPILLS/LEAKING CONTAINERS/ RUNOFF/STANDING LIQUIDS	X			
17. SEWER, STORM DRAIN PROBLEMS				
18. EROSION PROBLEMS				
19. INADEQUATE SECURITY				
20. INCOMPATIBLE WASTES				
21. MIDNIGHT DUMPING				
22. OTHER (specify):				

VII. PERMIT INFORMATION

A. INDICATE ALL APPLICABLE PERMITS HELD BY THE SITE.

- ☐ 1. NPDES PERMIT ☐ 2. SPCC PLAN ☐ 3. STATE PERMIT (specify): _____
☐ 4. AIR PERMITS ☐ 5. LOCAL PERMIT ☐ 6. RCRA TRANSPORTER
☐ 7. RCRA STORER ☐ 8. RCRA TREATER ☐ 9. RCRA DISPOSER
☐ 10. OTHER (specify): _____

B. IN COMPLIANCE?

- ☐ 1. YES ☐ 2. NO ☐ 3. UNKNOWN

4. WITH RESPECT TO (list regulation name & number): _____

VIII. PAST REGULATORY ACTIONS

- ☐ A. NONE ☐ B. YES (summarize below)

IX. INSPECTION ACTIVITY (past or on-going)

- ☐ A. NONE ☐ B. YES (complete items 1, 2, 3, & 4 below)

1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION (mo., day, & yr.)	3. PERFORMED BY: (EPA/State)	4. DESCRIPTION

X. REMEDIAL ACTIVITY (past or on-going)

- ☐ A. NONE ☐ B. YES (complete items 1, 2, 3, & 4 below)

1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION (mo., day, & yr.)	3. PERFORMED BY: (EPA/State)	4. DESCRIPTION

NOTE: Based on the information in Sections III through X, fill out the Preliminary Assessment (Section II) information on the first page of this form.

To: Dale Bryson

Paul - please
JFM BTP

From:

Non-responsive

Sub: Leachate From Lutter Dump, Glenview, Ill.

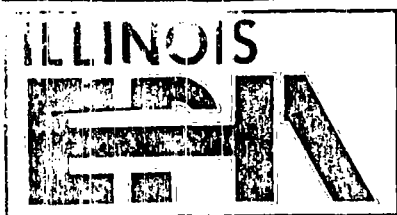
As I mentioned recently I have been watching the flow of leachate from the old Lutter dump into the West Fork of the North Branch of the Chicago River for over three years. During the entire time the flow has been very steady at the rate equal to several garden hoses running full. Apparently the old brick yard clay pit must have opened springs which have soaked through all of the old garbage & debris that now fills it. The water is stained dark brown and carries a light oil sheen much of the time. The flow I refer to appears to enter a ditch from several submerged points as the flow increased along the ditch. The ditch parallels John's street until it enters the ditch along Chestnut street leading to the river.

Last year a second flow appeared near the

north western corner of the old dump when a storm detention basin was constructed in connection with the industrial park development along John's street. There is now a steady flow from the basin. There are several areas in the basin that never seem to dry out enough to step on without sinking in. In one of these areas the seeping has become centralized and has become a steady flow from a hole 2 or 3 inches in diameter. The water is not as dark a color as that at the southern source but it has a definite oil sheen on it. The flow is to a wooded ditch that flows east to the River.

I have no idea what went into this old dump but it is a big one and I'd feel much better if the flows were well sampled.

More construction in this area is expected soon so it would be good if samples could be taken ^{soon} before everything is disrupted.



Environmental Protection Agency

1701 S. First Street Maywood, IL. 60153

312/345-9780

Refer to: 03110201 - Cook County - Glenview/Krohn

May 23, 1983

Village of Glenview
1225 Waukegan Road
Glenview, Illinois 60025-3071

Attn: Paul T. McCarthy

Dear Mr. McCarthy:

Thank you for your inquiry of May 9, 1983.

The Krohn Development Corporation was granted Supplemental Permit No. 1982-83 on September 14, 1982 to modify operations at the Glenview site. This supplemental permit does not stipulate a schedule for closure of the facility. This permit does state that the elevation of the highest point on the site not exceed 675 feet. The date of closure of the site will depend on the rate at which they receive waste and thus reach the approved elevations. Waste materials presently being accepted at the site is limited to demolition debris and solid fill material.

The site is presently not operating in accordance with the permit. The Agency held a Pre-Enforcement Conference with Krohn Development on January 20, 1983. The following items were agreed to at this meeting.

- 1) The leachate flow and the associated pond will be secured with compacted clay by January 31, 1983.
- 2) The piles of material will be spread and compacted by February 17, 1983.
- 3) Krohn is to submit a letter to the Agency by February 15, 1983 describing a date of initiation for the installation of the required monitor wells.

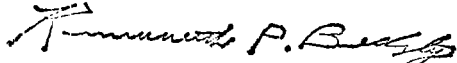
A meeting was held on March 15, 1983 to determine Krohn's progress in completing these items. The meeting revealed that there had been some work done to correct the leachate problem but it had not been fully resolved. The spreading and compacting of the materials had been partially completed. The monitor wells had not been installed. Krohn had submitted a proposed ground water monitor plan for Agency consideration on April 26, 1983.

As a result of these apparent ongoing violations, this matter has been referred to the Agency's legal staff which will, in turn, refer this matter to the Attorney General's Office for the filing of a formal complaint.

I hope this answers your questions regarding the above site.

Your interest and concern in this matter are appreciated. If we can be of further assistance, please feel free to contact this office.

Sincerely,



Kenneth P. Bechely, Northern Region Manager
Field Operations Section
Division of Land Pollution Control

KPB:MWS:pgb

cc: Division File
Northern Region



DATE: March 3, 1983

TO: Division File

FROM: Glenn Sturnard, Northern Region, FOS *gjs*

SUBJECT: 03110201 - Cook County - Glenview/Krohn
Pre-Enforcement Conference

On January 20, 1983, a Pre-Enforcement Conference was held at IEPA Maywood Office in order to discuss the apparent violations at the above referenced site. Representing Krohn Development Co. were William J. Stanley of W.J. Stanley and Associates, and Joe Pierro of Krohn Development. Ken Bechely, Don Gimbel, and Glenn Sturnard of the Maywood Office were present.

The following agreements were reached at this meeting:

1. Regarding the leachate flow and associated pond, located in the southeast portion of the site (along river), Krohn Development agreed to seal the leaking area by January 31, 1983. The proper method of sealing was discussed, i.e. compacted clay.
2. Krohn Development agreed to spread and compact all piles of material which are on site within four weeks - February 17, 1983. Furthermore, all subsequent receipts would be deposited as per the permitted plan. A letter confirming points 1 and 2 will be submitted to the Agency by January 28, 1983.
3. A meeting will be held with the same participants on March 15, 1983. Krohn Development agreed to develop a plan to obtain cover material for the site by this date.
4. Krohn Development will submit a letter to the Agency by February 15, 1983 describing a date of initiation for the installation of the required monitor wells. Mr. Pierro stated that the installation appears to be contingent upon the release of \$20,000 held by the Village of Glenview. Bids for the wells have already been obtained. The Agency, it was explained, cannot interfere with Village-Krohn interactions.

Finally, it was agreed that the regional inspector will inspect the site on the agreed compliance dates in order to determine if compliance has been achieved on the above points.

GJS:pgb

cc: Northern Region



DATE: March 3, 1983

TO: Division File

FROM: Glenn Sternard, Northern Region, FOS *gfs*

SUBJECT: 03110201 - Cook County - Glenview/Krohn
Pre-Enforcement Conference

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Finally, it was agreed that the regional inspector will inspect the site on the agreed compliance dates in order to determine if compliance has been achieved on the above points.

GJS:pgb

cc: Northern Region

CERTIFIED MAIL

Refer to: 03110201 - Cook County - Glenview/Krohn

September 21, 1983

Parkway Bank and Trust Company
as trustee under Trust No. 4730
4800 North Harlem Avenue
Harwood Heights, Illinois 60656

Gentlemen:

The Agency has previously informed Mr. Richard Krohn, who is the beneficial owner of your trust No. 4730, of apparent noncompliance with the requirements of the Environmental Protection Act and the Rules and Regulations adopted thereunder. These charges against Parkway Bank and Trust Company as Trustee under Trust No. 4730 and Richard Krohn are set forth in Attachment A to this letter.

Please be advised that this matter has been referred to the Agency's legal staff for the preparation of a formal enforcement case and to the Attorney General's office for the filing of a formal complaint.

In accordance with Section 31(d) of the Environmental Protection Act, the Agency will provide you with an opportunity to meet with appropriate Agency personnel in an effort to resolve such conflicts which could otherwise lead to the filing of a formal complaint. This meeting, if it is to be held, is required to be held within 30 days of your receipt of this notice unless the Agency agrees to a postponement.

Please contact the undersigned of the Agency's legal staff at 312/345-9780 within seven (7) days if you wish to schedule such a meeting or at any time if you have any questions regarding this matter.

Sincerely,



Donald L. Gimbel
Technical Advisor
Enforcement Programs

DLG:gec

cc: Office of the Attorney General
Division File
✓ Northern Region

Attachment

Investigations conducted by this Agency have disclosed the following violations which constitute violations of the Illinois Environmental Protection Act and Chapter 7 of the Illinois Pollution Control Board Rules and Regulations on Solid Waste:

Leachate was observed flowing and ponded on site and leaving the site, entering the North Branch of the Chicago River (southeast portion of site). Your permit states that "All leachate emergence from the site shall be controlled by prompt application of additional soil, spread, compacted and reseeded as necessary to prevent erosion.

- 2) No equipment operator is present on site to spread and compact the received materials at acceptable intervals.
- 3) Piles of demolition debris, concrete and asphalt were present over the majority of the site in violation of your permit. All piles of received material not intended for road use should be spread and compacted, in compliance with both Rule 303 of the above Rules and with your permit.
- 4) Putrescible waste (wood demolition, railroad ties) was observed on site. This site has not been permitted to accept such waste and the material should be removed.
- 5) Monitor wells required in Permit No. 1973-68-DE revised 6/30/81, Supplemental Permit No. 82-83, have not been installed.

Attachment

Region